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UNITED STATES DISTRICT COURT

FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA,

Case No. CR S-03-148 GEB

CALIFORNIA,

STIPULATION TO CONTINUE STATUS CONFERENCE

12 Plaintiff,

V.

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KAREN BREDICE,

Defendant.

IT IS HEREBY STIPULATED AND AGREED, by and Gilbert R. Geilim, Esq., counsel for KAREN BREDICE and McGregor W. Scott, United States Attorney, and Dan Lindhardt, Assistant United States Attorney, counsel for the United States of America, that Status Conference in the above-captioned matter set for Friday, November 18, 2005, at the hour of 9:00 A.M., be vacated and continued to Friday, January 20, 2006, or a date that is convenient to the court.

This Stipulation is entered into for the following reasons:

- Further time for investigation in needed.
- Counsel is engaged in a felony trial in the Superior Court of California, Compton Judicial District, case entitled PEOPLE V. LEONARDO SERRANO, Case Number: NA069008.

STIPULATION TO CONTINUE STATUS CONFERENCE

3. On August 22, 2005 the Court signed an order granting Subpoena Duces Tecum under Rule 17 (C). As a result of this new disclosure, boxes of medical files were delivered to the FBI offices in Los Angeles. The many files are in the process of being reviewed and are pertinent to the defense of this case. given the voluminous number of files, further time is needed to complete this investigation.

- 4. Further, Defense Counsel believes that failure to grant the continuance would result in a miscarriage of justice because they have been conducting and will continue to conduct their own investigation into the facts of this case and underlying defenses, and need additional time to develop the facts and prepare for trial.
- 5. The government does not object to a continuance of the trial.
- 6. Based on the above-stated findings, the ends of justice served by continuing the case as requested outweigh the interest of the public and the defendants in a trial within the original dates prescribed by the Speedy Trial Act.
- 7. For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161, et seq., within which trial must commence, the time period of November to January, is deemed excludable pursuant to 18 U.S.C. § 3161 (h)(8)(A) because it results from a continuance granted by the judge at the defendants' request without government objection on the basis of the judge's finding that the ends of justice served by taking such action outweigh the best interest of the public and defendant in a speedy trial.

3 of 3

	Case 2:03-cr-00148-GEB Document 13 Filed 11/17/05 Page 3 of 3
1	8. The parties agree and stipulate and request that the
2	Court find that nothing in this stipulation and order shall
3	preclude a finding that other provisions of the Speedy Trial Act
4	dictate that additional time periods are excludable from the
5	period within which trial must commence.
6	9. Further, I have spoken to Assistant United States
7	Attorney, Dan Linhardt, who has agreed to the continuance of
8	this Status Conference. By signing below, defense counsel
9	represent that they have conferred with their respective clients
10	about this stipulation and that defendants concur in all facts
11	and requests contained in this stipulation.
12	IT IS SO STIPULATED
13	/s/
14	Dated: 11-15-05 Gilbert R. Geilim, Esq.
15	Counsel for Defendant BREDICE
16	Dated: 11-15-05

Dan Linhardt, Assitant United States Attorney

ORDER

IT IS SO FOUND AND ORDERED this 16th day of November, 2005. The Status Conference in this matter is continued to January 20, 2006.

> /s/ HONORABLE GARLAND E. BURRELL UNITED STATES DISTRICT JUDGE

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